

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

CAROLYN W. HAFEMAN
Plaintiff,

V.

LG ELECTRONICS, INC.
Defendant.

PLAINTIFF'S TRIAL EXHIBIT LIST

Civil Action No. 6:21-cv-00696-ADA

PRESIDING JUDGE Judge Albright				PLAINTIFF'S ATTORNEY IN CHARGE Max L. Tribble, Jr.			DEFENDANT'S ATTORNEY IN CHARGE	
TRIAL DATE (S): April 24, 2023				COURT REPORTER			COURTROOM DEPUTY	
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX1							[MOVED TO JOINT EXHIBIT LIST]	
PX2							[MOVED TO JOINT EXHIBIT LIST]	
PX3							[MOVED TO JOINT EXHIBIT LIST]	
PX4	10			5/25/2021		HAFEMAN-LG_000190-000379	File History for United States Patent No. 10,325,122	401/402 403 802 MD
PX5	12			5/25/2021		HAFEMAN-LG_000554-000731	File History for United States Patent No. 10,789,393	401/402 403 802 MD
PX6	8			5/25/2021		HAFEMAN-LG_003042-003280	File History for United States Patent No. 9,892,287	401/402 403 802 MD
PX7	199			6/2/2021		HAFEMAN-LG_000732-002898	File History for United States Patent No. 8,601,606 [MOVED TO JOINT EXHIBIT LIST IN PART]	401/402 403 802 MD

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX8					8/30/2002	HAFEMAN-LG_000023-HAFEMAN-LG_000032	The Retriever Admin Screen Drawings (Hafeman 6)	401/402 403 602 802 901 ILL CUM
PX9	55				4/15/2011	HAFEMAN-LG_004243-HAFEMAN-LG_004246	Front Door Software Corporation Press Release re Free Laptop Recovery Software (Hafeman 36)	MD
PX10	54				5/24/2011	HAFEMAN-LG_004215-HAFEMAN-LG_004217	Email Campaign Confirmation re University Laptop Registration Sign Up (Hafeman 35)	
PX11							[MOVED TO JOINT EXHIBIT LIST]	
PX12					6/4/2013	HAFEMAN-LG_003733-003779	Launch Silicon Valley - Program of Events and Presenting Companies Overviews	401/402 403 802 901 CUM
PX13	59				1/1/2015	LG_00027616-LG_00027633	Master Supply Agreement between LG Electronics ("LGE") and LG Electronics USA, Inc. ("Buyer") (Lee 21)	105 401/402 403
PX14					11/9/2015	HAFEMAN-LG_006502	Guardian Angel Articles of Incorporation	105 802 901
PX15					12/11/2015	HAFEMAN-LG_006506	Guardian Angel Statement of Trade Name	105 802 901
PX16					4/4/2016	HAFEMAN-LG_006810	FrontDoorSoftware to Guardian Angel, Inc. Share Conversion Agreement and Consent to Asset Transfer	401/402 403 602 802 901

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX17							[MOVED TO JOINT EXHIBIT LIST]	
PX18					2/1/2017	HAFEMAN-LG_007646	Email from C. Hafeman to A. Eiss re Resigning	401/402 403 602 802 901
PX19	58				7/31/2017	LG_00027533-LG_00027555	Mobile Application Distribution Agreement (Lee 19)	105 401/402 403 MIL
PX20					1/15/2020	LG_00027556	Amendment Mobile Application Distribution Agreement	105 401/402 403 MIL
PX21					3/29/2018	TANGIBLE_000001-TANGIBLE_000003	Email from L. Carboneau to J. Young and C. Yu re Patent Portfolio for Sale with Industry-wide EoU: Computer Security, Communication and Mobile Advertising (TIP#1006) (Carboneau 3; Lee 23)	401/402 403 408 602 701/702 802 901
PX22	13				8/1/2018	LG_00027566-LG_00027608	Microsoft Device Partner Program Enrollment Form (Lee 20; Flo 20; Andersen 20)	105 401/402 403 MIL
PX23					8/13/2018	TANGIBLE_000009	Email from L. Carboneau to L. Carboneau re OFFER RECEIVED & EP VALIDATION: Patent Portfolio for Sale with Industry-wide EoU: Computer Security, Communication and Mobile Advertising (TIP #1006) - Hafeman portfolio	106 401/402 403 408 602 701/702 802 901 MIL

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX24					10/18/2018	TANGIBLE_000014	Email from L. Carboneau to L. Carboneau re Updated Patent Portfolio for Sale with Industry-wide EoU: Computer Security, Communication and Mobile Advertising (TIP #1006) - Hafeman portfolio	106 401/402 403 408 602 701/702 802 901 MIL
PX25					12/13/2018	TANGIBLE_000010	Email from L. Carboneau to L. Carboneau re NEW EP DIVISIONAL: Patent Portfolio for Sale with Industry-wide EoU: Computer Security, Communication and Mobile Advertising (TIP #1006) - Hafeman portfolio	106 401/402 403 408 602 701/702 802 901 MIL
PX26					1/10/2019	No bates	Threat Intelligence, "Consumers Demand Security from Smart Device Makers" (https://www.darkreading.com/threat-intelligence/consumers-demand-security-from-smart-device-makers)	401/402 403 602 701/702 802 901
PX27					10/9/2019	MSFT_HAFEMAN000396-MSFT_HAFEMAN000434	Microsoft YouTube video titled "How to find and lock a lost Windows laptop Microsoft" (Flo 35; Andersen 35)	105 401/402 403 602 701/702 703 802 901 MIL
PX28					12/23/2019	No bates	Press Release, "Thomas Yoon Named President and CEO, LG Electronics North America" (Lee 17)	401/402 403 802 901
PX29					7/14/2020	LG_00027613-LG_00027615	Air Waybill 988 HAN 33279046 (Lee 22)	401/402 403 602 802

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PX30					7/4/2020	LG_00027611-LG_00027612	Air Waybill 180 HAN 66538894	401/402 403 602 802
PX31					9/3/2020	LG_00027610	Commercial Invoice & Packing List	401/402 403 602 802
PX32					8/4/2020	TANGIBLE_000018	Email to L. Carboneau to Tangible IP, LLC re FINAL OPPORTUNITY - Patent Portfolio Related to: Findmyphone, Lost Device Recovery System, Communication and Mobile Advertising Patents - Hafeman (TIP 1006)	106 401/402 403 408 602 701/702 802 901 MIL
PX33					8/5/2020	TANGIBLE_000004	Email to L. Carboneau re FINAL OPPORTUNITY - Patent Portfolio Related to: Findmyphone, Lost Device Recovery System, Communication and Mobile Advertising Patents - Hafeman (TIP 1006)	106 401/402 403 408 602 701/702 802 901 MIL
PX34					11/29/2021	No bates	Press Release, "LG Electronics Announces New CEO and Other Changes to Aggressively Tackle 2022 and Beyond" (Lee 18)	401/402 403 802 901
PX35					1/10/2022	GOOG-HAFE-00000015-GOOG-HAFE-00000016	"Find My Device" Development Overview (Dinu 2)	105 401/402 403 701/702 703 802 MIL

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX36					6/10/2022	GOOG-HAFE-00000013-GOOG-HAFE-00000014	Find My Device GMS Core Services (Security module)	105 401/402 403 701/702 703 802 MIL
PX37					9/21/2022	TANGIBLE_000005	Email from L. Carboneau to C. Boon re FW: Patent Portfolio for Sale with Industry-wide EOu: Computer Security, Communication and Mobile Advertising (TIP #1006)	106 401/402 403 408 602 701/702 802 901 MIL
PX38							[MOVED TO JOINT EXHIBIT LIST]	
PX39							[MOVED TO JOINT EXHIBIT LIST]	
PX40							[MOVED TO JOINT EXHIBIT LIST]	
PX41					11/4/2022	No bates	Subpoena to Microsoft to testify at a deposition. (Flo 32; Andersen 32)	401/402 403 602 802 901 CUM DUP MD
PX42					10/7/2022	No bates	Plaintiff's Second Notice of Deposition Pursuant to Fed. R. Civ. P. 30(b)(6) to Defendant LG Electronics, Inc.	401/402 403 602 802 901 CUM DUP MD

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX43					9/1/2022	No bates	Subpoena to Google to testify at a deposition CUM DUP MD MIL	401/402 403 602 802 901 CUM DUP MD MIL
PX44	38				11/11/2022	LG_00092290-LG_00092227	Carrie Hafeman's LinkedIn Profile (Hafeman 5)	105 401/402 403 701/702 802
PX45	23				00/00/0000	LG_00094285-LG_00094290	Tangible Website About Page (Carboneau 5)	105
PX46					00/00/0000	HAFEMAN-LG_006120-HAFEMAN-LG_006142	Tangible IP US Patent 9,892,287 vs. Google Find My Device - Evidence of Use (Carboneau 16)	401/402 403 602 701/702 802 901 MIL
PX47					00/00/0000	HAFEMAN-LG_006094-HAFEMAN-LG_006119	Tangible IP US Patent 9,892,287 vs. Android Find My Device - Evidence of Use (Carboneau 17)	401/402 403 602 701/702 802 901 MIL
PX48	22				00/00/0000	TANGIBLE_000169-TANGIBLE_000200	Tangible IP-Executive Summary for the sale of Hafeman Portfolio (Hafeman 18; Carboneau 4)	105 401/402 403 701/702 802
PX49					00/00/0000	No bates	Tangible website	401/402 403 802 901

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PX50	49				00/00/0000	HAFEMAN-LG_003796-HAFEMAN-LG_003799	Front Door Software Corporation Summary and Convertible Debt Term Sheet (Hafeman 30)	105 401/402 403 802
PX51							[MOVED TO JOINT EXHIBIT LIST]	
PX52							[MOVED TO JOINT EXHIBIT LIST]	
PX53							[MOVED TO JOINT EXHIBIT LIST]	
PX54					00/00/0000	No bates	Front Door Software About (https://frontdoorsoftware.com/about/)	105 401/402 403 802 901 U
PX55					00/00/0000	No bates	Front Door Software homepage (https://frontdoorsoftware.com/)	105 401/402 403 802 901 U
PX56					00/00/0000	FRONTDOOR_001940 – FRONTDOOR_001944	Front Door Software Corporation and Front Door Security (FDSC) Service License Agreement	401/402 403 703 802 901 CUM
PX57	89				00/00/0000	HAFEMAN-LG_007676	Front Door Software Audit - Spreadsheet	105
PX58	16				00/00/0000	MSFT_HAFEMAN000004-MSFT_HAFEMAN000006	Microsoft Support "Find and lock a lost Windows device" (Flo 37; Andersen 37)	105 401/402 403 MIL
PX59					00/00/0000	MSFT_HAFEMAN000127 and MSFT_HAFEMAN000130	Microsoft support question "What is the 'Default' setting for 'Find My Device'" (Flo 38; Andersen 38)	105 401/402 403 MIL

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PX60					00/00/0000	MSFT_HAFEMAN000170- MSFT_HAFEMAN000172 and MSFT_HAFEMAN000177	Microsoft Support article titled "Windows location service and privacy" (Flo 39; Andersen 39)	105 401/402 403 MIL
PX61							[MOVED TO JOINT EXHIBIT LIST]	
PX62							[MOVED TO JOINT EXHIBIT LIST]	
PX63	90 424				00/00/0000	No bates	App Store Preview-Phone Found (https://apps.apple.com/us/app/phone-found/id1299425946)	105 401/402 403 602 802 DAU
PX64					00/00/0000	MSFT_HAFEMAN000435	Video depicting how to find and lock a lost windows laptop from Microsoft (Andersen 36)	105 401/402 403 701/702 703 802 MIL
PX65					00/00/0000	No Bates	LG Mobile Phone video "What to do if your LG phone is lost/stolen" [https://www.youtube.com/watch?v=U54MFMLunrQ]	105 401/402 403 602 701/702 703 802 MIL U
PX66					00/00/0000	No bates	Cell Phone Images (Lee 24)	401/402 403 602 802 901 DEM U
PX67							[MOVED TO JOINT EXHIBIT LIST]	

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX68	62				00/00/0000	LG_00043293	Excel Spreadsheet with financial data re smartphone (Lee 27)	403 DUP
PX69							[MOVED TO JOINT EXHIBIT LIST]	
PX70	64				00/00/0000	LG_00043292	Excel Spreadsheet with financial information re laptops sold in the United States. (Lee 29)	403 DUP
PX71							[MOVED TO JOINT EXHIBIT LIST]	
PX72							[MOVED TO JOINT EXHIBIT LIST]	
PX73					00/00/0000	No bates	Tech Guide Channel video-How to find, lock or erase Android phone	401/402 602 701/702 703 802 805 901 U

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX74					00/00/0000	No bates	LG Q70 Specs	106 602 901 U
PX75					00/00/0000	No bates	LG Ultra PC 13.3 Slim Laptop Specs 1	106 602 901 U
PX76					00/00/0000	LG_00002662-LG_00002813	LG User Guide for LM-X410AS	
PX77					00/00/0000	No bates	Lookout, "Phone Theft in America"	401/402 403 602 701/702 802 805 901 U
PX78							[MOVED TO JOINT EXHIBIT LIST]	
PX79	35				00/00/0000	LG_00043186-LG_00043188	LG How to use Google Find my Phone and Device Reset (Dinu 3; Lee 25)	ILL 105 802 901
PX80	300				00/00/0000	No bates	Google Support-Find, lock, or erase a lost Android device	105 401/402 403 602 802 901 U
PX81	36				00/00/0000	GOOG-HAFE-00000007-GOOG-HAFE-00000008	Screenshot of Google Play Store app overview page for Google Find My Device (Dinu 4)	401/402 403 802
PX82					00/00/0000	GOOG-HAFE-00000005-GOOG-HAFE-00000006	Screenshot of Google Nest Help web page titled "Find your phone with Google Assistant" (Dinu 5)	401/402 403 602 802
PX83							[MOVED TO JOINT EXHIBIT LIST]	

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PX84	42				00/00/0000	HAFEMAN-LG_005608-HAFEMAN-LG_005612	Confidential Intake Patent Listing Questionnaire (Hafeman 11)	401/402 403 602 802 901
PX85					10/21/2002	HAFEMAN-LG_000004	First Screen	401/402 403 602 901 802
PX86					00/00/0000	Demonstrative	LG Q-70 phone with charger	DEM
PX87					00/00/0000	Demonstrative	LG Gram laptop with charger	DEM
PX88	302				11/21/2022	No bates	Defendant LG Electronics, Inc.'s Objections and Responses to Plaintiff's First Set of Requests for Admission	105 401/402 403 CUM DUP
PX89	330				11/21/2022	No Bates	Defendant LG Electronics, Inc.'s Second Amended and Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories	105 401/402 403 CUM DUP X
PX90					10/24/2022	No Bates	Defendant LG Electronics, Inc.'s Supplemental Objections and Responses to Plaintiff's First Set of Requests for Production of Documents	105 401/402 403 802 CUM DUP
PX91	302				12/20/2022	No bates	Defendant's First Amended and Supplemental Responses to Plaintiff's Requests for Admissions	105 401/402 403 CUM DUP X
PX92							[MOVED TO JOINT EXHIBIT LIST]	
PX93					00/00/0000	HAFEMAN-LG_000009-HAFEMAN-LG_000011	Recovery Dialog Box and Flow Chart samples	401/402 403 602 802 901

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PX94					00/00/0000	HAFEMAN-LG_000012-HAFEMAN-LG_000012	The Retriever Admin Screen	401/402 403 602 802 901
PX95					11/1/2003	HAFEMAN-LG_003616-HAFEMAN-LG_003637	The Retriever	401/402 403 602 802 901 X
PX96					00/00/0000	HAFEMAN-LG_003652-HAFEMAN-LG_003655	Retriever Security Screen Lock	401/402 403 602 802 901
PX97					4/15/2019	HAFEMAN-LG_003451-HAFEMAN-LG_003455	Customers using FrontDoorSoftware security	401/402 403 602 802 901
PX98					00/00/0000	HAFEMAN-LG_003848-HAFEMAN-LG_003850	Article published in the Canyon Courier titled "Businesswoman slams door on computer thieves"	401/402 403 802 805 901 MD
PX99					4/1/2009	HAFEMAN-LG_003934-HAFEMAN-LG_003934	Article published in the Canyon Courier titled "Talking Software Goes Global"	401/402 403 802 805 901
PX100					2/7/2009	HAFEMAN-LG_004318-HAFEMAN-LG_004318	Associated Press: Stop thief "Software lets stolen laptops speak up"	106 802 805 901 ILL
PX101					9/22/2011	HAFEMAN-LG_003851-HAFEMAN-LG_003853	Email from M. Hughes to C. Hafeman copying M. Kebare Congrats! Please keep this a secret for now	401/402 802 901

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE	BATES RANGE	DESCRIPTION OF EXHIBITS* AND WITNESSES	OBJECTIONS
PX102					9/29/2011	HAFEMAN-LG_003865-HAFEMAN-LG_003872	Vator Splash brochure	401/402 403 802 901
PX103					10/6/2011	HAFEMAN-LG_003675-HAFEMAN-LG_003675	Email from V. Chirico to B. Maris, R. Miner copying J. Kraus and C. Hafeman re Introduction - Front Door Software	401/402 403 802 901
PX104					00/00/0000	HAFEMAN-LG_003717-HAFEMAN-LG_003732	FrontDoor Software CCUPCA Conference	602 802 901 MD
PX105					00/00/0000	HAFEMAN-LG_003844-HAFEMAN-LG_003847	FrontDoorSoftware Executive Summary	802 805 901 DUP
PX106							[MOVED TO JOINT EXHIBIT LIST]	
PX107					2/20/2007	HAFEMAN-LG_003530-HAFEMAN-LG_003532	Consulting Agreement for Computer Related Services executed by Conrad Farmer	401/402 403 802 901
PX108					9/29/2011	LG_00092300	VATOR Video Presentation	401/402 403 802 901
PX109					9/29/2011	LG_00092301	VATOR Youtube Video Page	401/402 403 602 802 901
PX110					8/27/2013	No bates	Front Door Software: Press (https://web.archive.org/web/20130827181333/http://www.frontdoorsoftware.com:80/press/)	401/402 403 802 805 901 U

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PX111					10/26/2013	No bates	Front Door Software: Customers (https://web.archive.org/web/20131026022900/http://www.frontdoorsoftware.com/customers/)	401/402 403 802 901 U
PX112					9/20/2012	No bates	Article in the Daily Trojan titled "New technology helps DPS catch criminals, Dept. says" (https://web.archive.org/web/20130827224111/http://dailytrojan.com/2012/09/20/new-technology-helps-dps-catch-criminals-dept-says/)	802 805 901 ILL U
PX113					8/27/2012	No bates	Article in Daily Titan titled "CSUF giving students free theft recovery software" (https://web.archive.org/web/20130826154908/http://www.dailytitan.com/2012/08/csuf-giving-students-free-theft-recovery-software/)	802 805 901 U
PX114					1/24/2012	No bates	Article in Daily Bruin titled "UCLA offers free laptop theft protection and tracking software" (https://web.archive.org/web/20120702125824/http://www.dailybruin.com/index.php/article/2012/01/ucla_offers_free_laptop_theft_protection_and_tracking_software)	802 805 901 U
PX115					9/26/2011	No bates	Article in The Wesleyan Argus titled "One Laptop Recovered After Four Computer Burglaries This Weekend" (https://web.archive.org/web/20130905221610/http://wesleyanargus.com/2011/09/26/one-laptop-recovered-after-four-computer-burglaries-this-weekend/)	802 805 901 U
PX116					9/12/2011	No bates	Article in The Wesleyan Argus titled "Public Safety and ITS Introduce Free Laptop Recovery Software" (https://web.archive.org/web/20130906001114/http://wesleyanargus.com/2011/09/12/public-safety-and-its-bring-free-laptop-recovery-software/)	802 805 901 U